

Approved:



MITZI S. STEINER

Assistant United States Attorney

Before: THE HONORABLE GABRIEL W. GORENSTEIN  
United States Magistrate Judge  
Southern District of New York

**20 MAG 12576**

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UNITED STATES OF AMERICA : **SEALED COMPLAINT**

- v. - : Violation of  
MICHAEL HAGOOD, : 18 U.S.C. §§ 922(g)(1),  
Defendant. : 924(a)(2), and (2)  
: COUNTY OF OFFENSE:  
: BRONX

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SOUTHERN DISTRICT OF NEW YORK, ss.:

JAMA JOSEPH, being duly sworn, deposes and says that he is a Detective with the New York City Police Department ("NYPD"), and charges as follows:

COUNT ONE

1. On or about October 14, 2020, in the Southern District of New York and elsewhere, MICHAEL HAGOOD, the defendant, knowing he had previously been convicted in a court of a crime punishable by imprisonment for a term exceeding one year, knowingly did possess a firearm, to wit, a Hi-Point semi-automatic 9mm pistol, and the firearm was in and affecting commerce.

(Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and (2).)

The bases for my knowledge and for the foregoing charge are, in part, as follows:

2. I am a Detective assigned to the Firearms Suppression Section of the NYPD, and I have been personally involved in the investigation of this matter. This affidavit is based upon my personal participation in the investigation of this matter, my conversations with law enforcement agents, as

well as my examination of reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

3. Based on my conversations with NYPD officers, who were present at and participated in the arrest of MICHAEL HAGOOD, the defendant, and my review of reports prepared by other law enforcement officers, I have learned, among other things, the following:

a. On or about October 14, 2020, four NYPD officers ("Officer-1", "Officer-2", "Officer-3", and "Sgt-1") (collectively, the "Officers") were patrolling in two unmarked vehicles in the vicinity of Webster Avenue and 168th Street in the Bronx, New York. The Officers were in uniform. That area is associated with the Bloods gang, which frequently identifies itself with the color red.

b. At approximately 1:00 a.m., Officer-1 spotted an individual, later identified as MICHAEL HAGOOD, the defendant, who was standing next to a double parked SUV. HAGOOD was wearing a bright blue sweatshirt, a color associated with rivals of the Bloods. Officer-1 observed that HAGOOD had a weighted fanny pack strapped across his chest.

c. The Officers parked their vehicles and approached HAGOOD. Officer-1 and Officer-2 approached HAGOOD from the north side of Webster Avenue, while Sgt-1 and Officer-3 approached HAGOOD from the south side. The Officers did not give HAGOOD any verbal commands.

d. Officer-1 observed that HAGOOD began to breathe heavily and blade his body away from Officer-1 and Officer-2. Officer-1 then observed HAGOOD grab the fanny pack, turn, and attempt to run southbound on Webster Avenue.

e. HAGOOD collided with Sgt-1, who was approaching HAGOOD from behind. Sgt-1 grabbed HAGOOD and felt a hard, L-shaped object inside the fanny pack. The Officers recovered a firearm (the "Firearm") from the fanny pack and placed HAGOOD under arrest. The Officers subsequently secured the Firearm.

4. Based on my review of an NYPD Firearm Examination Report, I have learned that the Firearm is a Hi-Point semi-automatic 9mm pistol. I have also learned that the pistol was loaded with live ammunition and was operable.

5. Based on my training and experience, and my communications with other law enforcement agents, including a Special Agent from the Bureau of Alcohol, Tobacco, Firearms and Explosives who is familiar with the manufacturing of firearms, I know that Hi-Point semi-automatic 9mm pistols are not manufactured in New York State.

6. I have reviewed criminal history records pertaining to MICHAEL HAGOOD, the defendant, which show that HAGOOD was convicted on or about May 21, 2009, in New York County Supreme Court, of criminal possession of a controlled substance in the third degree, in violation of Section 220.16 of the New York Penal Law, a felony, which is punishable by imprisonment for more than one year. HAGOOD was sentenced to a seven-and-a-half-year term of imprisonment.

WHEREFORE, deponent respectfully requests that a warrant be issued for the arrest of MICHAEL HAGOOD, the defendant, and that he be arrested, and imprisoned or bailed, as the case may be.

/s/ sworn telephonically

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Detective Jama Joseph  
New York City Police Department

Sworn to before me this  
23rd day of November, 2020

*Gabriel W. Gorenstein*

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THE HONORABLE GABRIEL W. GORENSTEIN  
UNITED STATES MAGISTRATE JUDGE  
SOUTHERN DISTRICT OF NEW YORK